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Memo to File – Discussion with IDNR on 2015 Semi-Annual Groundwater Monitoring Report Review

Dan Nicoski and Erin McCoy had a phone conversation with Hylton Jackson (IDNR) about the 2015 Semi-Annual Groundwater Monitoring Report for Vogel. We discussed different problems with the report.

These problems include:

- Lack of approved QAPP.
- Inconsistency with PDB and HydraSleeve sampling with placement in well between events.
- Some of the PDBs were placed above the screened interval during the May sampling.
- Lack of statistical analysis to determine trend stability (they use a trend line).
- Lack of overall interpretation of what the data means in relation to the site.

We also discussed the remedial options presented. Both of the injections will cut the plume at the property line, but there is no proposed method addressing the source area. We also discussed turning the groundwater treatment system back on (which IDNR seemed agreeable to) and agreed that this option would probably be never ending; however, if MNA showed that the downgradient material was being remediated naturally, and if hydraulic containment could be proven, and the PRP wanted to continue operating the system for ever, this could work as a remedial option. We also discussed the potential use of air sparge and soil vapor extraction. Dan expressed concern that it would not work with the fine grained layer; however we decided to mention it to the PRP as another option to consider.

IDNR mentioned that the PRP was looking at buying the property to the south, which would allow them to put in necessary wells in this area that the current owner won't let them put in. Hylton suggested that these wells could be used to confirm that the plume is stable. I told him that due to the increase in downgradient, off site wells since 2012, this was probably unlikely, but he still wanted to pursue it.

I told Hylton I would have EPA's comments to him no later than July 23, 2015. I also told him that while we had discussed some of the comments, there were specific ones that were listed, such as typos, etc. that I had not mentioned in the conference call.

Hylton agreed that this communication worked for him and wanted to continue to work together this way with EPA in the future.

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